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JUN 25 2021

CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTA

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

vs.

Plaintiff(s),

Alicia Welleh Togba

Case No. 21-cv-1497 JRT/LIB
(To be assigned by Clerk of District Court)

DEMAND FOR JURY

TRIAL

YES ☐ NO ☐

Defendant(s).

(Enter the full name(s) of ALL plaintiffs and defendants in this lawsuit. Please attach additional sheets if necessary.)

ISD #742 Saint Cloud Public Schools
ATTN: Willie Jett II, Superintendent

EMPLOYMENT DISCRIMINATION COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name Alicia Welleh Togba
Street Address 320 2nd AVE S #302
County, City STEARNS, WAITE PARK
State & Zip Code MN 56387
Telephone Number 612-232-2364

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address

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where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1 **ISD # 742 Saint Cloud Public Schools**
 Name **Willie Jett II, Superintendent**
 Street Address **1201 2nd St S**
 County, City **Stearns, Waite Park, MN 56387**
 State & Zip Code

b. Defendant No. 2

Name

Street Address

County, City

State & Zip Code

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g., Additional Defendants 2.c., 2.d., etc.)

JURISDICTION

The Court has jurisdiction over this action under 28 U.S.C. § 1331.

3. This employment discrimination lawsuit is based on (check only those that apply):

- a. ☒ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et. seq.*, for employment discrimination on the basis of race, color, religion, gender, or national origin. **NOTE: In order to bring suit in federal district court under Title VII, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission (EEOC).**
- b. ☐ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et. seq.*, for employment discrimination on the basis of age (age 40 or older). **NOTE: In**

order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission (EEOC)

- c. ☒ Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et. seq.*, for employment discrimination on the basis of disability. **NOTE:** In order to bring suit in federal court under the Americans with Disabilities Act, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission (EEOC).
- d. ☒ Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et. seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance. **NOTE:** In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office (EEO) representative or agency.
- e. ☒ Other (Please describe.)

Retaliation

4. If you are claiming that the discriminatory conduct occurred at a location other than the defendant's address above, please provide the following information on where the conduct occurred:

216 8th Ave N	Waite Park	MN	56387
1000 44th Ave N	St. Cloud	MN	56303
1300 Jade Road	St. Joseph	MN	56574
(Street Address)	(City/County)	(State)	(Zip Code)

5. When did the discrimination occur? Please give the date or time period:

December 19th, 2019 — March 15, 2021

ADMINISTRATIVE PROCEDURES

6. Did you file a charge of discrimination against the defendant(s) with the Equal Employment Opportunity Commission or other federal agency?

- a. ☒ Yes Date filed: 3-23-2021
- b. ☐ No

7. Have you received a Notice of Right-to-Sue Letter?

- a. ☒ Yes If yes, please attach a copy of the letter to this complaint.
- b. ☐ No

NATURE OF THE CASE

8. The conduct complained of in this law suit involves (check only those that apply):

- a. ☐ Failure to hire me
- b. ☒ Termination of my employment
- c. ☐ Failure to promote me
- d. ☐ Failure to accommodate my disability
- e. ☐ Terms and conditions of employment differ from those of similar employees
- f. ☒ Retaliation
- g. ☒ Harassment
- h. ☒ Other conduct (please specify):

RACISM; used mental health against me, when I denied medical Records to Bir they complained to FBI about my Social/Personal Facebook account, they called police on me. lead to my mental health case manager

- i. Did you complain about this same conduct in the charge of discrimination, referred to in number 6 above?

☒ Yes ☐ No

9. I believe that I was discriminated against because of my (check all that apply):

- a. ☒ Race
- b. ☐ Religion
- c. ☐ National origin

d. ☒ Colore. ☐ Genderf. ☒ Disabilityg. ☐ Age (my birth year is: _____)h. ☐ Other (please specify):

i. Did you state the same reason(s) in the charge of discrimination, referred to in number 6 above?

☒ Yes☐ No

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct (i.e. how, where, and when). Each paragraph must be numbered separately, beginning with number 10. Please write each allegation of discrimination in a separately numbered paragraph.

10.

See Attached word document
And attached statement

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper as Additional Facts and continue to number the paragraphs consecutively.

REQUEST FOR RELIEF

State briefly and exactly what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

I want All district 742 employees to partake in a intensive 1 year long diversity Program non Paid.
 compensation for my tuition cost & Loans for failed semester / because of stress & depression from event
 Pay for my medical bills for my mental health treatment due because did not need therapy before incident
 5 million dollars for compensation wages stress depression relocation & Pain & suffering

Date: 6/24/2021

Alicia Loggia
 Signature of Plaintiff

Mailing Address

320 2nd AVE S. # 302
 Waite Park MN 56387

Telephone Number

612-232-2364

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.

question 10 Answers

10. The racism started when I first started the job because there was a lot of Trump talk on the job always in the kitchen by all the staff where I worked at the McKinley learning center. I told them I was not voting for trump because he was sexist and racist and did not support woman and I did not like how he put the Mexican kids in cages and lost their parents even though I agreed with some of his policies.

11. I told Kristi Scott that I was taking a vacation with my family in the beginning of the next year going on a cruise that I wanted to request the days off early because I did not want to have any reasons I could not go but Kristi Scott told me it was too early to request the time off so when the time came, I could not request the days off because she said I did not have enough accumulative hours and could not take the trip.

12. The manager from apollo named Katie she would come to McKinley learning center to visit Kristi Scott; she would give me dirty looks and make me feel uncomfortable like most of the staff at the apollo high school did for over 3 years before I started working for the school district.

13. The delivery guy that delivered the catered food to the Riverwoods site I worked at would always be upset and pounding on the door if I was not at the door the very second, he arrived with the food and he would always make ignorant and demeaning comments so I would be cautious and even if I had to use the rest room I would not I would hold it until I got the food.

14. I was always subject to constant schedule changes being the only person that had constant schedule changes without notice.

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15. Kristi Scott acted like she cared about me getting me to let my guard down and telling her about some of my issues with trusting people and the issues why I never really dealt with my family and many personal things I did not share with anyone but thinking she cared about me I thought I could share with her but I never told her I was retired for my mental health until the last minute when the incidents with the racism and schedule changes started to affect my mental health and even then I did not tell her I told the human resource director Shane Keating.

16. Kristi Scott knew I was on Retirement social security disability and she would keep putting my time cards in late so on one check it looked like I made substantially more that week or worked more hours while knowing I had to make under a certain amount every month or I could lose my RSDI she even gave me a pay raise without informing me knowing I would have to adjust my hours to be under a certain income amount or I could lose my retirement social security disability.

17. when the first shut down happened in May 2020 I was sent to Apollo high school where my son graduated from, I had experienced racism while dealing with incidents with him and my daughter in the district but didn't realize how deeply rooted it was until I started working for the St. Cloud school district.

18. my position at the St. cloud school district in the kitchen as a kitchen helper even though I ran a kitchen/cafeteria and was the only employee at the Riverwoods day treatment program and I was told by my boss that hired me Mr. Joe Happe that I was hired specifically for that school, and I knew he hired me because I was biracial.

19. The first shut down in may 2020 I was making bag lunches at Apollo high school I can't remember the exact date but my manager Kris said to not take something off a certain pallet and I really couldn't hear her because I was in the back so when I needed more products I went to the front and I ask a older white lady if she knew what I was not sup-pose to take and she asked me could I read she said in theses exact words "can you read". I was upset so I went back into the kitchen and found my manager Kristi Scott and told her, but she told me if I have any questions don't ask anyone else but her.

20. There was another instance when a lady came up to me and said she was watching me work and that I was making three bag lunches at a time but I took it as a compliment and other instances where my manager would say share and go around and get some products from other tables but they did not seem friendly so I would stay away.

21. There was another incident when Kris Scott's daughter and son was operating the radio and I went over to their table to get some products for my bag lunches because she wanted all the products used before opening new products and Kris Scott's daughter and son said to me that I listen to ghetto rap music.

22. There was a lady name tammy she kept coming over to my table taking products off my table we had a brief conversation where she asked me about my children and I told her I had high standards for my children and if they don't follow through they can't stay with me and Tammy got upset and started telling me that I should rethink it because she lost a child and there were a many instances where Tammy would come over and just take things without asking so I had grabbed a box off my table right before she was going to take it.

23. Tammy and one other lady worked together every day and they used to keep their purses under the table like someone was going to steal from them even though they knew all the employees from working with them for years.

24. Every day I worked by myself and everyone else had a partner making their bag lunches and I made just as many as the partner teams by the same time no one ever wanted or volunteered to work with me as my partner.

25. Then there was another incident when the man who hired me Mr. Joe Happe came in and said does every body know Alicia and everyone stop and looked at me and then he said she works with the kids we don't want to and I kind of took it in an offensive way because the kids I work with have behaviors, issues because I worked at the Riverwoods day treatment program.

26. I have a connection and bond with them kids and then I went back to my school and all the trump talk proceeded in the lunchroom where I work at our lunch breaks and how Biden wasn't their president.

27. My aunt died in May 2020 when I was working at apollo high school I had got the call on the job and started crying and ran outside of the building to get some privacy and Kristi Scott came out after me acting like she cared about me.

28. one of the men who delivered the food to each catering site he would always be mad and red in the face and banging and pounding on the door if I was not there to receive the food at his convenience, so I got tired of it and when the second shutdown ended and I went back to ALC / Mckinly learning center I had Kristi Scott talk to him because I was fed up with his behavior and after kris Scott talked to him he had a better attitude she said they have a

understanding with each other. The delivery driver would crack jokes when kris and the second cook was in the cooler saying they were in the cooler making out.

29. One day I was talking to my coworker Corrina about issues I was having with my apartment that I see a cockroach in my apartment and that day when the delivery driver delivered my food, he said loud outside in front of the Riverwoods building have a nice day and take care of them roaches.

30. Then when the second shut down happened I had to go to St. Joseph to Kennedy school I don't care how hard you try to hide that you are racist you can't hide it will show no matter how hard you try to hide it the awkward feeling of being secluded every day because I was the only colored person working there after the first couple of days when the Somalia lady went on maternity leave and my manager was in and out I would walk up to the crowd and as soon as I would join or try to say something it would get really quite and they would start to leave.

31. The teachers would speak to the Caucasian individuals and just look at me and keep walking like I did not exist.

32. I worked the to go lunch pick up station and unloaded the buses with another lady and the white man that was in charge of loading the buses and keeping count of the production of lunches passed out would only talk to the white lady I worked with, and she would talk to me.

33. I got comments because I was making two bag lunches at a time, I was told I was working too fast by the white lady I was working with she said there was not enough work so I needed to slow down so we could stretch out the work, but she was a normal employee not a supervisor.

34. I was always be overlooked and always felt invisible, teachers and other staff would never acknowledge me or my presence.

35. The white man who was in charge of loading the buses with products and keeping count of the number of lunches given out he would never talk to me or allow me to help him with anything he would report everything to the white lady I was working with, and she would tell me he never spoke directly to me especially if he could avoid it many of the of the employees never held a conversation with me. the employees that were not racist would.

36. Everyone at the job was clicked in by family or close friends and been there for year's they moved so slow I had to wait on them to do my job.

37. I was the only bi- racial person there at that location and I won't lie I felt like I was going to a kkk meeting every day. I could count on one hand the number of black American's or biracial employees staffed in the kitchen throughout all the kitchen staff in the St. Cloud school district and I only noticed because of the racism I was experiencing so I paid great attention to how many-colored staff there were when we had mandated meetings for only kitchen employees.

38. A few of the woman would hold conversations with me and others wouldn't you could tell the racist ones from the ones that were not.

39. I did not know what to do it had gotten so bad so early on because of so many racist events I even called and asked the procedure to give a notice to terminate my employment with the company and eventually change my mind, because after I hung the phone up my boss called right after because I had talked to joe Happe secretary and minutes later joe Happe called me back his self and we talked but I did not tell him the real reason why because I did not want to

admit that I was dealing with racism because I knew that they were going to fire me as soon as I admitted that I had been experiencing many incidents.

40. I want to say December 10 or 11th I was working at Kennedy a school in St. Joseph MN and I was unloading the buses left over lunches from the delivery and my manager told me to set a box on a table then the other lady manager got mad and angrily and vulgarly yelled at me that the box does not go there after she clear as day heard my manager tell me to put it there so I got the box and put it where she wanted it and went on doing what I was supposed to.

41. Then I was relaxing in bed on the 12th I believe it was a Saturday I had received a call from my manager Kristi Scott she said that she noticed some behaviors and she had some concerns and she was being sent to all the school for a certain reason but she never mentioned the reason but she brought up the incident with the other manager at Kennedy and voiced that she did not like what she did and we talked about various other instances.

42. I can't really remember everything but eventually she told me to keep a notebook in my pocket and a pen and when these incidents arise jot them down and the incident and what happened and with who were what the time and date and if I didn't know the person's name don't approach them come to her and she would tell me their name.

43. She would call me on holiday like Martin Luther King Day and other times when I thought it was inappropriate until she got me to finally admit that I was dealing with racism and racist events and Kristi Scott even witnessed some of the events and I always reported them to her if she was around.

44. The lady Tammy that I briefly met at Apollo high school kept asking me when we got paid when the holiday was almost here in November and I had to tell her I didn't know because my check goes in my daughter's account and she just lets me know when it is deposited and the amount I thought it was weird and racist because she worked there for many years, I had only almost been there for two school years plus I only worked 19 hours a week because I had to be under a certain income to keep receiving my RSDI payments.

45. There were more than a few instances where kris Scott forgot to put both of my time sheets in and when I received my check it was for only one week I had to talk to human resources and Kristi Scott because it looked like I made more than I was supposed to, and I felt like because of her mistakes I would get my retirement taken away.

46. A couple of days after the incident with the other manager and the empty box situation that Kristi Scott witnessed and said it was ok to set the box on the table but the other manager didn't want the box there and she started yelling at me really aggressively telling me she didn't want the box there and told me to take the box and put it somewhere else I didn't say anything I just went on about my day and that's when Kristi Scott explained to me she was being sent out to every school for some reason but she didn't get in to detail for what but she explained to me she didn't like what the other manager did and how she treated me and that there were bigger issues and eventually she got me to admit that I was dealing with Rasim on the job but kris already knew because I was reporting the incident to her but Kristi Scott was not reporting the incidents that I found out and I tried to not say anything but she kept calling me she even called me on Martin Luther King day.

47. we were not working on a lot of holidays and before we went to Kennedy everyone was supposed to be off for the holiday but joe Happe called and said me and Corrina had to work and he would add an extra day of pay I had already made plans but since things felt like they were getting rocky I didn't say anything I just showed up like normally because I was always happy and reading my Bible a lot on the job because it helped me deal with everything that was going on at the location and Deal with the Rasim I was experiencing because I was all alone there everyone would always leave way before their shift was over I didn't dare because I knew about white privileges and I didn't have that luxury.

48. The same manager who yelled at me scolded me for putting the large utility flatbed cart in the receiving area even though another employee told me that was where it was supposed to go but she didn't want it there. The office was right across from the lunchroom and the people that worked in the office would always watch me.

49. The woman would try to control the way I work and that I needed to slow down so they could stretch the work out as long as possible. The lady I worked with doing the to go lunches was nice you could tell she was not racist she always talked to me, and I felt comfortable voicing some of my opinions and issues with her.

50. So I called in Monday and Tuesday for personal reasons so I go to work December 16, Wednesday and everything seems fine all of the sudden the manager who yelled at me comes up to me and asked me can she talk to me to take a walk with her down the hall and the first thing that comes out her mouth is how she has mixed nieces and nephews and her sister is

married to an African guy and I am trying to figure out what this has to do with her behavior or the incident.

51. Then the same day my manager Kristi Scott pulls me to the side in the hallway in front of everyone and says it is social awkwardness and tries to sweep everything under the rug like I am crazy.

52. I had already consulted a lawyer and That day I retain a layer named Phillip G. Villaume located in Bloomington Minnesota at Villaume & Schieke, PA because I knew I need to take action right away because I had a huge problem but after February 2nd, 2021, when the explosion happened at McKinley learning center, I went to the lawyer's office, and he could not see me but when Mr. Villaume called me back, he told me he wanted 50,000 up front and 5,000 each meeting or he would not take my case.

53. I went back to my home school and when I returned to my home school, I was talked to by my manager Kristi Scott about having too much energy and I told her I was having a manic episode and that was at the end of January 2021.

54. When I went back to McKinley learning center, Kristi Scott admitted to me that the doctor canceled her shoulder surgery because they said she had covid and it scared her lungs that is how they knew she had it in December 2020 and she was at work putting everyone's life in danger. Especially mine because I was the only employee there helping her in the kitchen at McKinley learning center when the school were being prepared to open back up because of her lifting and other health restrictions.

55. Kristi Scott knew she had covid because her daughter was in the hospital on a ventilator for a while and she asked everyone to pray for her daughter in the meantime my daughter had got sick and was sick for three months and I could not figure out how she got sick until she admitted that the doctors told her covid scared her lungs and canceled her surgery until they could verify, she no longer had covid.

56. I had mentioned to Kristi Scott that I was thinking about getting married and I wanted to take two weeks off for the wedding and the honey moon and she said to me that would never happen and I could not figure out why she would say that being I only worked there 19 hours a week and I was already retired and did not think that I was that important to the company especially since all the racism and discrimination that she witnessed and knew about that she never reported that I eventually realized.

57 . Kristi Scott had the dish washer Emma who is partially deaf shadowing me and I was supposed to check her work and make sure she was on task and everything she did was correct as far as the food prep counts and how she prepped the food and make sure she did everything was done correctly basically supervising her, I got called in the office because Kris said she had been listening to me for a couple of days and I needed to tell Emma please and thank you more often and I explained to Kris it was not my intension on being rude but I have a lot going on and I will work on it.

58. Then the weekend came and went so on Monday when I came in I confronted Kristi Scott and told her it is not my job first of all to supervise or do any of the things that she had me doing with Emma and I have a lot going on in my life with two kids in collage and myself in

collage coming here to do my own job and my own life and she told me if I have any issues not to hold them inside to let her know so we can work them out.

59. After confronting her with the incidents that I defended myself against things got very rocky and I always felt like I was on pins and needles she had issues because I started to say no and defend myself against the actions she took against me that I knew were wrong because before I just went along with everything and never said no or complained of anything I just did my job and even things that was not my job being a team player I always went above and beyond my duties until I started to buckle down because of all the issues with the racism and constant schedule changes also I finally realized Kristi Scott was also racist.

60. I came into work a couple of days before the incident on February 2, 2021 and there was no work for me to do that is when I realized they were getting prepared to fire me and then Kristi Scott came to me and changed my schedule again and told me to come to McKinley learning center Monday through Thursday but on Friday go straight to the Riverwoods site and do not come to McKinley learning center because on Friday's she was the only kitchen staff on duty there that day.

61. I thought we were good then a couple of days or maybe weeks later Kristi Scott thought it would be helpful if I had a meeting with AL Jhonson he is the principal of ALC/McKinley learning center the alternative school I worked with and this happened in January 2021, and I told him that I was done talking if he could print out my union contract paperwork because I had already had a lawyer and he requested it and I told him what was going on and he suggested for me to meet with a Shane Keating human resource director of district 742, but he warned me too be

cautious how my approach was and what I said because Shane Keating's father finances the St. cloud school district, so I did. Mr. Al Jhonson also told me no matter how the meeting went to come back and let him know how it went.

62. In the beginning of the meeting with Mr. Shane Keating that took place at the district building in Waite Park in January 2021 I was really in depth about who I was and that I was retired my ethnicity and background credentials and specifically that I did not need the job because I have been retired since 2009 and after that meeting, I decided that I was done having meetings and it was a waste of my time because I did not want to have the meeting anyway and because he made me feel like I was nothing and he admitted to knowing about the issues with the racism and that it would take him a very very long long time to fix it.

63. The next week, which was February 2, I went to AL the Principle of ALC and told him that everything had to be out on the line because I was going on with the suit and things were going to get ugly. I came to work February 2, at 8:45 and did not realize I was supposed to be there at 9:30 because of the consistent schedule changes so Kristi Scott my manager told me I could not punch in, so I left and went to target and came back.

64. When I got back I told her that the consistent schedule changes had to stop because they have been a problem in the past and they are continuing to be a problem and I have to call joe to square away my mileage from September of 2020 so I will talk to him about the schedule changes and the mileage and if it was up to my daughter I would not be working here because she does not want me working here or like me working there and that she would have been have quite the job Then my manager Kristi Scott got highly upset. I said the things about my

daughter because I knew it would set her off because one day my daughter dropped me off to work and there were some things that belonged to the kitchen out by the door, and I took them in with me.

65. later that day my daughter told me that Kristi Scott had a racist event and told me that Kristi Scott was racist and not to get comfortable with her because she was giving her dirty looks and Kristi Scott was acting like my daughter took the stuff, I took in the school that day and my daughter warned me that Kristi Scott was racist and to be careful around her and keep my personal business to myself.

66. I didn't even realize that my daughter was right until the therapist their company sent me to through the company referral program called vital work life told me what was reported that happened on the second of February that is when I realized she was racist because Kristi Scott and joe Happe fabricated a story to cover their self's and fabricated the incident they claim happen when I never had any incidents but to get rid of me, they made up anything

67. On the 2nd of February sudden she was so mad she said I did not have to work there I told her I have put up with her racism and a lot of other shit and then she told me I needed to go up to Al Jhonson's office and have a talk and I told her I was done talking then she disappeared then I saw Joe Happe go into the office he walks up to me while I am prepping the salads and he talking to me and I just remember saying I don't quite until I want to and him threatening me saying with that attitude you have you might not have a choice and that's when I told joe that he will be talking to my lawyer because I am suing them that is when joe went into the office and Al Jhonson the principal cornered me in the office and shut the door.

68. I am in there alone just me and them and I think I blacked out cause I went off on them verbally and made them feel really low and they said I needed to leave I grabbed my stuff so fast and ran out of there I was so upset and distraught I had just bought a purse and it got damaged during the incident and I let them know I been put out if better places I think everyone in the hall of the school heard me calling them racist while I was leaving. The day my daughter dropped me off to work and I had already gone in the building and my daughter told me that my manager was giving her dirty looks and she also told me she felt my manager was racist not to tell her nothing or let her in my business and because Kristi Scott knew my daughter had a lot of influence on my life and my decisions because Kristi knew that my work checks were deposited into my daughters account and if my daughter told me to quit I would I knew exactly what to say to make her snap especially because she did not know that I knew about the racist event she had with my daughter.

69. Per my retirement I was never supposed to work again and especially not with male bosses I only took the job because the manager I would be working with day to day was a woman and my boss Joe Happe had a woman receptionist / assistant because I have been raped before and I was beaten for multiple years by my 35-year-old baby daddy when I was 14 and had his baby.

70. I have had multiple meetings since with the union rep present and the director of human resources Mr. Shane Keating and Joe Happe and Shane Keating also lied to my mental health case manager LeAnn on her voicemail stating I gave him verbal permission to talk to her when I told him that would never fly with LeAnn, and she knows about the multiple instances of racism

I have experienced with the district me and my children and so does my employment counselor that helped me get the job.

71. Mr. Shane Keating said that I would not be fired for the incident, and he sent me to have 10 meetings with a therapist and the therapist wanted to talk with my mental health case manager LeAnn, so they coordinated and had a meeting with all three of us.

72. they knew I was retired but they did not know for what I never wanted anything I did not do anything wrong I did my job and even more everything was going well until I complained about racism and schedule changes then they tried to fire me, and I told them if they do that, I will sue them for that too. Shane Keating wanted to talk to LeAnn my case manager So I told him the procedure of the release of information and he lied to LeAnn and told her I gave him verbal permission to talk to her when I never did because LeAnn wouldn't let that fly he kept asking me the same question because I said in the office on the 2nd that I was from the hood and I grew up in the streets so I knew how to handle the situation and before I was called into the office by joe Happe I told him he was going to talk to my lawyer and he made it seem like I threatened them which that never happened.

73. Before Shane Keating told me not to contact any of the employee's at the Riverwoods day treatment or the school district I call the receptionist at the Riverwoods program I ran the kitchen at her name is Hoa and told her that I would not be returning to work there because they knew of my complaint about the racism and schedule changes and they were going to fire me and she told me no matter what happens to stay in contact with her and she was on

vacation in Mexico I told her I just wanted to let her know what was going on because I probably would not be coming back to work there.

74. I have been retired for a very long time since 2009 I have been a nursing assistant I also have a national phlebotomy technician certificate and a two year degree as a medical assistant were I can run the front office and back office I can run a clinic I would never threaten a school district or anyone in the school and plus I was already with a lawyer and ready to sue I would never jeopardize my position plus I was back in school taking all the prerequisites' for the 2 year nursing program.

75. Kristi Scott and joe Happe fabricated a story and made it a sound like a threatened them when before we even went into the office, I told him he was going to have to talk to my lawyer and I also told joe I didn't come to him because someone told me not to and to go above him because he wouldn't take any action.

76. Then Shane Keating kept having the same meeting asking the same question he assured me that I would not be fired then he called me with stipulations to go to their therapist to make sure I was ready to come back and be able to handle stressful situations so I agreed then the lady tried to request my medical records all the way to birth and even wrote on the release that Shane would have verbal permission to talk to LeAnn and LeAnn caught it because I sent it to her to look at it before I signed anything because I knew they were on BS and I refused to sign it they ran me through the FBI

77. then I had another Meeting I had to let Shane know I would not be attending any meetings without the union rep because I was Sueing the company because al told me that Shane's

father finances district 742 and Shane's father opened the first ALC in Monticello MN so I made sure to keep it all fact based I noticed that the union rep never ever said anything in any meeting on my behave she was on their side so one day the union rep called me I was driving on the highway and she told me I was yelling at her and she hung up the phone in my face.

78. After the union rep hung the phone up on me 10 minutes later St. Cloud police called me and said they needed to talk to me about Facebook post so I went to the police station when I got there I met with Rachel Johnson the school resource officer she said that they forwarded it to one of their friends and just so happened he was on vacation so she picked it up she also said that they said that the post was very vague and non-threatening to the school but that is not what they claimed.

79. she stated the post where so vague she wanted to explain what they meant so I did and luckily she worked with me at Riverwoods the first year I was employed there so she knew my character and how much I dedicated myself to the Riverwoods program and the children that attended the program Shane Keating kept digging and digging when he didn't get my medical records to birth the district specifically Shane Keating ran me through the FBI I later found out Shane Keating even lied and said the therapist they sent me to gave me a bad recommendation that I could not and wouldn't be able to return to work but the therapist said that was a lie because we had one more session and that's when she would make the recommendation.

80. I also believe that Shane Keating was in her office during one of the sessions because she kept looking over to the right of her I asked her what she kept looking at she said she was

looking out the window and she did it after every question, so I knew he was in her office telling her what to ask me.

81. The therapist that the school district sent me to also suggest me to go to legal aid so the Next day I did, and they gave me the number to the EEOC and I made my complaint Against them then the next day he called me to the office and said that I was up for termination I said cool do what you got to do but just know I am suing you.

82. It was march 31 2021 I got my car fixed about two days after and everything was running nice and smooth then I noticed that someone tampered with my car because I got on the highway and my car was going from side to side like a fish tail I had to lower my speed significantly and drive really careful and I do believe that they had someone tamper with my car The incident almost caused me to have a car crash all I could say is I am going to die tonight.

83. I took my car back to the car dealer and ask him if he fixed my car or if he tried to kill me even though I had no work done on the steering and everything was nice and tight when I left the dealership after paying 420 or 410 dollars to fix my car so the mechanic put my car in the air with me in it after driving it and tightened the steering wheel I could feel the car shaking and see the steering wheel turning as he was under the car.

84. I have called so many lawyers and nobody will help me or take my case. There are a lot of people scared to go against the district and I am even scared since I was finally terminated, I called Hoa the receptionist at Riverwoods, and she told me they were instructed not to answer my calls and I even believe that they threatened them. Hoa was very nervous and scared that

she was going to get caught taking to me so I told her I wouldn't call no more because I didn't want them to get in trouble or get fired like me so I wouldn't call her anymore.

85. I have a feeling that they are so connected and have so much money they are going to get away with ruining my life because for the first time in my life I was finally happy every day and had no reason why I just was but they ruined my life last semester I was on the dean's list and now I have failed all my classes and my life is so miserable and all I did was my job and even more than my job I always try to be a good person and be the best I can be but I am never good enough and now my case manager Said she thinks it could be and would be very beneficial for me to have trauma therapy for what they did to me because she can see how it has and is affecting me.

86. I knew that as soon as I started to stand up for myself and say no or complain about anything especially the racism and the racist events I was experiencing they were going to find any reason or make up any lie to fire me and I tried to quit but joe Happe told me I was hired specifically for that school and begged me not too my daughter told me that this would happen as soon as I started to stand up for myself or make any kind of complaints and that was the main reason why I never wanted to admit that I was even dealing with racism even though they already knew.

87. I wanted to take a medical leave and be compensated with pay like I heard that some of my coworkers did when covid started because my son has severe asthma, and my daughter has auto immune issues and I could of got doctors statements to prove the health issues and them being high risk but Kristi Scott said I could take the leave but I would not get paid even though I

knew other employee's getting paid on leave during covid that had high risk family members or spouses/ significant others.

88. When I was at Kennedy school in St. Joseph MN after the incident when the supervisor yelled at me and talked to me vulgarly after the box incident that happened on a Friday so I did not return until Wednesday the next week because my building had a power outage and I could not get dressed because of no hot water so I called in. Then Tuesday I did not come in because my therapy dog had a stroke and I realized it was worse than I thought so I took him to an emergency vet instead of waiting for the appointment that I made for him on Wednesday.

One of the managers had mentioned that day she had to put her cat down and the comment made me very emotional and start crying so I ran into the back of the kitchen where nobody was to get privacy and Kristi Scott ran after me and tried to console me and giving me a hug knowing that she was racist still trying to hide it.

That was the same day that I was pulled to the side by both my manager and the other manager that disrespected me about the box that was witnessed by Kristi Scott. When the one manager started to explain she had mixed nieces and her sister was married to a African man and I thought to myself what does that have to do with the box situation and how she talked to me. The same day Kristi Scott about an hour later tried to sweep the racism under the rug by stating it was social awkwardness and other untrue excuses.

Statement

To whom it may concern my name is Alicia Welleh Togba I am a white and African female my mother is white, and my father is African from Monrovia Liberia. I am writing this letter to give some background information on myself and why it is so important for the St. cloud school district to be held accountable for the discriminatory events that took place against me for two school years while being employed as a kitchen helper even though I ran a kitchen by the kitchen and other staff including some teachers at McKinley learning center and apollo high school during the first covid shut down and at Kennedy elementary school during the second shutdown.

I have been on my own since I was a very young girl, I had a daughter when I was fourteen that now is 23 by a 35-year-old man who beat me for multiple years, and I had another baby at nineteen years a son that is now 18. I have always been a hard worker working two and three jobs going to school and raising my children. I have never really had a good relationship with my family because my mothers family was and still is racist her mother told her when we were younger to give us up for adoption because we were black and my mother has nine siblings but I have no relationship with any of her family members and she has a big family many that I don't know or have never met they don't even keep a relationship with my mother.

My father he is from Monrovia Liberia so do to his traditions he disowned me for many years because my mother did not let me comply with his wishes to get an abortion with my first child when I was fourteen so we have never built a relationship he has family in America and Liberia but I don't have a relationship or know any of them and they don't know me, my father doesn't really know anything about me his self. I been dealing with racism all my life as a child growing

up in school and as a adult from all different races even my own race. I have been on retirement social security disability for my mental health since I was awarded it by the judge in 2009, I had 34 work credits and I have gone back to school and got my GED from job corps in St. Paul, MN.

I also completed the culinary program there because I was already a registered nursing assistant when I started attending the program, I also have a national phlebotomy technician certification and I went to get a associate degree majoring in medical assisting front office and back office so I can run a clinic and I have multiple various other training.

I only came to St. cloud / Waite Park area because my daughter got accepted to the collage of St. benedict and I wanted her to be close to home I have been here for five years since living here I have never been able to get me or my children a dentist appointment or good healthcare, so I have to travel back to the city for my family to have doctor appointment. When trump got in office the racism in St. cloud / Waite Park area and even surrounding areas got really bad and acceptable because of the I incidents with the St. cloud school district my former employer that I was working only nineteen hours a week because I am under income restrictions through the RSDI I almost was ready to leave the state of Minnesota even though I was born and raised in Minneapolis and have never lived anywhere else but I know for sure that I will be relocating back to the city of Minneapolis because of the incidents of racism at the district and other incidents in the community and surrounding areas.

I was dealing with the incidents of racism by former employer and their employees day to day I would read my bible multiple times a day on the job and because of the constant schedule changes I was never able to completely take prescribed meds every single day because I never

had a consistent schedule and I was the only employee that had constant schedule changes. I would never of started working again but I wanted to go back to school but the program I was working with wanted me to get a ticket to work instead of them paying for me to go back to school, so I did and I also enrolled in school part time at the community college. The semester of fall 2020 and the next semester because of the issues with the st. cloud school district and the affect of their behavior I had to drop a class and I failed a class which brought my GPA down substantially that I was threatened that I would be on academic probation if my GPA was not high enough I also enrolled in summer classes for summer semester 2021 but because of the consistent mental health issues and panic and anxiety attacks I decided to withdraw from classes so I can work on the issues that my former employer caused that greatly affected my mental health significantly also my mental health case manager Leann Ebert through central Minnesota mental health center that I been working with since 2018 that knows every second of my life and every detail what happen at the St. cloud school district my former employer wants me to partake in trauma therapy because of the affects of the incidents of the racism also Leann knows me so well she can tell if I am taking my meds by the sound of my voice on the phone.

February 2, 2021 the date of the incident where my manager Kristi Scott and her boss joe Happe lied about the incident that took place on that day I came into work at 8:45 and because of the constant schedule changes I was told I was early and could not punch in until 9:30 so I decided to leave and go to target I came back to the McKinley learning center where I started my day every day around 9:15 when I came in Kristi Scott and Corrina the newly promoted second cook was in the front by the ovens wright when you walk in the kitchen I calmy started

talking to Kristi Scott and stated that the schedule changes have been a problem for a long time and they are continuing to be a problem and since I still had to do my mileage reimbursement paperwork from September 2020 up to February 2, 2021 because I had to make sure of correct school shut down dates because of covid I would be going to talk to her boss Mr. Joe Happe about both situations that day after my shift then I mentioned that if it was up to my daughter I would not still be working there because she did not want me working there and did not like me working there I would of already quit.

I knew that would send Kristi Scott over the edge and make her snap because she had a racist event in the parking lot with my daughter one day when my daughter dropped me off at work, but she did not know I knew. So, after I said the comment Kristi Scott got highly upset and very red in the face and said to me Well you don't have to work here and all of a sudden, I said you know what I been putting up with your racism and all kind of shit, I did not mean for it to come out but it did. She then said I needed to go up stairs and talk with the principal Mr. Al Johnson and I replied and said no because I am done talking.

Then all of a sudden Kristi Scott disappeared and all of a sudden Mr. Joe Happe walked in and went into the office then he walked up to me talking ignorant to me all I remember saying is that I don't quit until I want to and he replied and said with that attitude you might not have a choice threatening me then I told him you know what you're going to talk to my lawyer then he walked away and went into the office and before I could finish putting the salads in the cooler that I just got done prepping he called me in to the office when I got in there Mr. Al Johnson was in there and he shut the door and that is when the explosion happen and I told them I

know how to handle this situation because I grew up in the hood and raised myself and I been retired since 2009 and every there the old racist white woman and every is trying to get retired something I already have and I made them feel really low and bad because I never have to threaten or bodily harm anyone because I can talk to you and make u feel low and bad I remember most of everything that was said but they told me to leave so I hurried up and grabbed my purse and phone and left but they lied and said something else happened I was never supposed to be in the office with the door closed because per my retirement I was never supposed to work again and especially with male bosses.

The only why I took the job is because the manager I would be working directly with was a woman and Joe Happe also had a woman assistant. Because of the trauma I suffered from being raped as a young girl and being pregnant by a thirty-five-year-old man I had a baby with when I was fourteen that beat me for many years, I was never supposed to be in the office by myself with them men no matter what the case was.

When I started having meetings with Mr. Shane Keating the human resource director every meeting, he asked me the same question and I did not know what he was talking about, so I stuck to stating only facts the union rep was never on my side or stuck up for me in any of the meetings she stayed quite every meeting. Then one day the union rep called me I was driving back from Minneapolis and she brought up Facebook post I did not know what she was talking about so I said that I was talking to her through the radio and she stated that I was yelling at her then she hung up in my face then ten minutes later the St. Cloud police called me and told me I needed to come there because the St. cloud school district complained about threatening

Facebook post so I immediately went to the police station when I got there officer Rachel Johnson talked to me and said they forwarded the message to one of their friends and just so happen he was on vacation so she picked it up she also said the post where so vague she did not know what I was talking about and wanted me to explain them so I did she asked me did I have any guns or weapons and released me I thought for sure I was going for something I did not do.

So, then Shane Keating had another meeting with me the same exact meeting and questions as the previous one and wanted to talk with my case manager he wanted verbal permission I told him that would never work that LeAnn would never allow it, but he called LeAnn and lied on her voice mail that I gave him verbal permission to talk to her anyway. Then he called a few days later with stipulations after he told I would not be fired for the incident that happened on the second of February 2021 and wanted me to go to a therapist they had through the program for the job before I could return to work so I did before all the sessions were completed the therapist hooked up with LeAnn and me for a meeting and she sent a release of information to me to sign to get my medical records all the way to birth and it also said that Shane Keating could talk to LeAnn on a verbal permission even though he knew that would not be possible.

I sent the release to LeAnn before signing she said I did not have to give them the information so I refused to sign the release and that is when Shane Keating ran me through the FBI he also said that the therapist gave me a bad recommendation to not be eligible to return back to work because of the therapist they sent me to gave me information I was able to figure out how to get the EEOC Charges against the St. Cloud School District.

